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Lobbying and the responsible firm: Agenda-setting for a freshly-conceptualized field

Abstract

‘Responsible lobbying’ is an increasingly-salient topic within business and management. We make a contribution to the literature on ‘responsible lobbying’ in three ways. First, we provide novel definitions and, thereby, make a clear distinction between lobbying and corporate political activity. We then define responsible lobbying with respect to its content, process, organization, and environment, resulting in a typology of responsible lobbying, a conceptual model that informs the rest of the paper. Second, the paper provides a thematic overview of the current literature underpinning lobbying and the responsible firm, and the underlying paradigms informing this literature. Third, the paper makes specific suggestions for a future research agenda, ending with a consideration of methodological implications of such research.

Introduction

Lobbying is often regarded as a ‘dirty business’ of back-room deals amongst powerful, corrupt ‘special interests’ (Mills, 1956), raising questions as to whether lobbying should even be allowed (Dahan, Hadani, & Schuler, 2013; on the governance of corporate political activity). Nevertheless, lobbying is firmly established in public life (see Oberman, 2004, p. 246) and has been defended on grounds of legitimacy and improved public policymaking (Dahl, 1982). Our paper examines the basis on which a firm could lobby in a responsible manner.

This is important for at least four reasons. First, lobbying can be irresponsible in ways that are harmful to social wellbeing (e.g., blocking regulatory attempts to reduce the negative externalities of business, misleading decision-makers in an effort to lower company costs). Second, firms can lose legitimacy if they are perceived to abuse the political process for their own self-interest (Grimaldi, 1998), particularly if they otherwise have a responsible reputation (Finnemore, 2009). Moreover, persistent public skepticism of lobbying arguably undermines trust in the political process more generally. Third, “the lack of systematic attention to lobbying is a noticeable gap in the [CSR] literature” (Anastasiadis, 2014, p. 264), and the failure to address lobbying weakens the CSR field (Bauer (2014). Fourth, without a clear notion of responsible lobbying, practitioners may focus on partial or inappropriate solutions. Transparency is an example of a partial solution, which we address in this paper (but see also the UK government’s anti-lobbying policy on public funding; Wright, 2016). For these reasons, we consider the complex relationship between lobbying and the responsible firm to be an interesting area of research.

The past decade has seen a steep increase in scholarship on the topic of responsible business and politics generally, notably with a move towards political CSR (Scherer & Palazzo, 2011; also Palazzo & Scherer, 2006), within which there is also growing interest in lobbying and the responsible firm (e.g., Bauer, 2016; 2017; den Hond, Rehbein, de Bakker, & Kooijmans-van Langveld, 2014; previously, Moon, Crane, & Matten, 2004). The increase in scholarly interest in

lobbying and the responsible firm, coupled with persistent public skepticism, suggest that now is an opportune time for a conceptual reassessment that addresses the extant literature and the underlying paradigms governing conceptions of politics and lobbying. These paradigms are interesting, because they inform existing, disparate conversations on responsible lobbying. Moreover, despite the interest in lobbying and the responsible firm, much of the scholarship associated with this interest addresses CSR and lobbying as two separate phenomena. That is, it is concerned with the interactions between CSR and lobbying with respect to such issues as trust (Liedong, Ghobadian, Rajwani, & O'Regan, 2015) or debt financing (Liedong & Rajwani, 2017). The present paper is concerned with responsible lobbying; that is, the actions of organizations as they seek to influence the frameworks within which firms engage in market-related activities. The paper thus makes a substantive contribution to this particular field of investigation.

This paper contributes, first, by clarifying what is meant by lobbying, proposing working definitions of both lobbying and responsible lobbying, and distinguishing between corporate political activity (CPA) and lobbying. Secondly, our working definition of responsible lobbying forms a conceptual framework underpinned by existing perspectives in the literature, and leads to the first comprehensive overview of the fast-growing literature on lobbying and the responsible firm. Thirdly, we propose a research agenda, which we conclude with a discussion of methodological considerations. We anticipate the paper being of value both to practitioners and researchers in management and political science.

Defining corporate lobbying and responsible lobbying

CPA and lobbying are often treated as synonyms (e.g., Doh, Lawton, & Rajwani, 2012; Lawton, McGuire, & Rajwani, 2013; Lux, Crook, & Woehr, 2011). Whilst both are clearly part of a firm's non-market strategy (Baron, 2006), we consider the conflation to be unhelpful for conceptualizing responsible lobbying. After defining corporate lobbying, we elaborate on the significance of the conceptual separation between CPA and lobbying. In so doing, we make a distinction between

direct actions (undertaken by company officers) and indirect actions (undertaken on behalf of the firm). We then present a working definition of responsible lobbying.

There has been little agreement about the precise nature of lobbying. Definitions tend to be contradictory and partial (e.g., Hansen & Mitchell, 2000, p. 893; Hillman, 2003, p. 463; Hojnacki & Kimball, 1998, pp. 777–778). Baron’s definition of lobbying (2006, p. 232, emphasis in original) provides a useful starting point:

The strategic communication of politically relevant information to government officeholders.

However, we consider Baron’s focus on the recipients of lobbying (government officeholders) to be too narrow. Policymaking engages a range of actors in a ‘policy soup’ (see Kingdon, 1984, pp. 21 & 77; also Richardson, 1996) and, as such, concepts and policies are generated in communities of practice, with diverse actors able to influence outcomes. We also consider Baron to include too wide a range of possible actors who engage in lobbying. We therefore modify Baron’s definition to reflect the complex nature of the political process, whilst focusing on a narrower set of actors:

Corporate lobbying is the strategic communication of politically relevant information by officers of a corporation to those political actors who have the power to substantially influence public policy outcomes in that policy-making environment.

In contrast, CPA can be defined as, “any business effort to influence public policy” (Windsor, 2006, p. 6). Whilst this includes lobbying, it also encompasses other activities, such as political advertising, financial contributions, political action committees, legal action (e.g., to challenge executive action), commissioning third-party lobbyists, stakeholder management, political campaigning (e.g., to support corporate narratives on climate change; see Wright & Nyberg, 2015), and even charitable contributions (Schlozman & Tierney, 1986, p. 150; see Werner, 2012, p. 4). The literature typically considers lobbying as a central subset of CPA (Bonardi, Hillman, & Keim, 2005; Bonardi & Keim, 2005; Coen, 1998; Hillman, 2003; Hojnacki & Kimball, 1998). Nonetheless,

lobbying and CPA are frequently treated as interchangeable in the literature, which is why this paper draws on work that refers to both CPA and lobbying.

We suggest that there are four substantive reasons to make the distinction between lobbying and CPA. First, both the nature of responsibility and the tools to promote responsible action are better-understood and better developed for many other elements of CPA than they are for lobbying. This is partly because of the role of corporate spending, to which much of the CPA literature is related. But whilst financial contributions are relatively simple to identify and regulate, lobbying costs are largely related to staff and maintaining office space in political centers. Whereas principles for responsible lobbying (including, e.g., codes of conduct) can be formally stated, ethical breaches are arguably subtler, and harder to regulate (see also Rasche, 2010, on the limits of standards).

Second, lobbying is intrinsically relational, distinguishing it from aspects of CPA, illustrated by Hillman and Hitt's (1999, p. 833) identification of a fundamental choice between relational and transactional approaches to CPA. Guo (2009) links lobbying to a longer-term relational approach and financial contributions to shorter-term perspectives. Work that conflates lobbying and CPA can obscure such distinctions. For example, den Hond and colleagues (2014, p. 793) refer to "CPA" as relational by definition, before (p. 798) drawing on Hillman and Hitt (1999) to indicate that firms *can* take a "relational" approach to CPA. Similarly, Lock and Seele (2016) also discuss CPA rather than lobbying in their recent paper on deliberative lobbying as a means of aligning CSR and CPA. Moreover, lobbying can influence whether a regulatory proposal emerges at all (e.g., Mahoney, 2008; Mazey & Richardson, 2001, pp. 219–220). The agenda-setting aspect of lobbying, in particular, requires a longer-term, relational approach; a view well-supported by both the academic literature (Baumgartner, Berry, Hojnacki, Kimball, & Leech, 2009; Coen & Thatcher, 2008; Coen & Willman, 1998) and by practitioners (Eppink, 2007; Reich, 1998).

The third element in our conceptualization of corporate lobbying concerns the actors involved. We view third-party influencing on behalf of a firm – by public affairs consultants, or even industry associations – differently from actions by corporate officers. Third parties, such as trade associations, clearly matter in the political process (and more widely; see Lawton, Rajwani, & Minto, 2017), and third-party influencing is of course a highly relevant aspect of a firm’s political engagement. However, it is a categorically different activity from company lobbying. That is, we consider *corporate* lobbying to only be carried out by the organization itself, involving actions undertaken directly by officers of the corporation. *Third-party* lobbying, commissioned to a greater or lesser extent by, but not fully under the control of, an individual firm, is a different phenomenon. In a sense, third-party lobbying is part of the firm’s ‘political supply chain’ – that is, it is an important activity that is externally-sourced – and we consider such third party lobbying to be more properly an element of CPA.¹

By contrast, firms have greater control over their own staff, in terms of who and how they lobby, as well as what they communicate when doing so. This is particularly important, given the relational nature of lobbying. For example, an in-house lobbyist develops relations with policymakers on behalf of her or his organization directly, whereas a third-party lobbyist represents numerous interests, either consecutively (as in consultants) or simultaneously (as in trade associations). We note that public affairs consultancies in Europe have been, “viewed with some scepticism by both companies – wary of delegating their interests to independents – and Commission officials who prefer to avoid speaking to ‘hired hands’” (McLaughlin, Jordan, & Maloney, 1993, p. 194). Consequently, such third-parties typically provide “specialist information and continuous political monitoring,” rather than engaging directly on behalf of firms that have established their own lobbying presence (Coen, 1997, p. 23).

¹ Inasmuch as smaller firms tend to be represented politically by their industry/trade associations, ‘corporate lobbying’ is a doubly-accurate term, as it can be considered the preserve of larger corporations.

The distinction between in-house and third-party lobbying is particularly relevant in material and/or controversial cases in which a given industry is disunited and its trade association thus rendered relatively ineffective (e.g., the automotive industry in the case of CO₂ regulation in the European Union; see Anastasiadis, 2014; Reed, 2007). Additionally, in-house lobbyists may lobby in a more responsible manner than third-parties (Bauer 2017, pp. 274, 318). An organization's specific choices on what particular policy issues should be dealt with by whom is therefore an interesting, but separate question. We posit that the more material an issue is for an organization, the more likely it is to seek to address it via in-house lobbying. Such a view is supported by Coen's (1997; 1998) account of the evolution of in-house lobbying in Europe, which emerged from reliance on third-party actors to the development of in-house expertise as the European Union increasingly affected their core interests.

The fourth substantive reason for distinguishing between lobbying and CPA relates to the particularities of lobbying. Lobbying *content* involves provision of information, often expressed in technical reports and position papers. By contrast, CPA can involve a range of 'products', such as legal argument or specie. The *processes* involved are also different. For example, political advertising may appeal to emotions (compared with lobbying, in which rational argument is highly valued; see Anastasiadis, 2014), and litigation is inherently conflictual, in contrast to the more relational and cooperative lobbying (see above; also Coen, 1998). Moreover, lobbying is an activity conducted directly by the *organization* rather than by third parties, as already discussed.

Furthermore, lobbying occurs in a particular policymaking *environment*, with its own rules of engagement. CPA, by contrast, occurs across the full panoply of environments. An example of this corporate political advocacy, which Wettstein and Baur (2016, notably pp. 200-203) develop using the case of Ben & Jerry's (and other companies') campaign in favor of same-sex marriage rights, which included publicity-generating actions like temporarily renaming an ice-cream. Other examples include stakeholder management and legal action.

Having clarified ‘corporate lobbying’ and distinguished it from CPA, we now turn to responsible lobbying. Any definition must allow the following question to be addressed: how are the responsibility attributes of a particular complex action to be judged (and by whom)? Developing a view of responsible lobbying therefore requires attention to framework conditions for lobbying, both inside the company and in the political arena within which lobbying occurs, in addition to the more obvious content and process of specific lobbying. We therefore build on newly-emerging literature (notably Anastasiadis, 2010; Bauer, 2014) to propose the following working definition, which directly informs the conceptual framework:

*Responsible corporate lobbying involves attention to four components: **Content** – promoting social good through public policy means; **Process** – adhering to ethical standards acceptable to all parties involved; **Organization** – the lobbying function is integrated into the firm, and the firm is respectful of the political process; and **Environment** – promoting an enabling context in which to lobby in a responsible manner.*

In our examination of the literature, we found both normatively-focused and practice-focused elements, and a dichotomy between research addressing the act of lobbying and that concerned with the conditions under which lobbying occurs (i.e. lobbying context). We have, therefore, developed a framework that encompasses these elements, presented in Table 1. Note that there is a conceptual overlap between normative and practical aspects, represented by dotted lines in the Table.

Table 1: Typology of lobbying and the responsible firm: *Conceptual model*

Typology of responsible lobbying		Components			
		Content	Process	Organization	External environment
Orientation	Normative focus				
	Practical mechanisms				
Aspect of lobbying		Operational lobbying: The act of lobbying		Conditions for lobbying: Lobbying context	

Paradigms of responsibility

Lobbying is not well-represented in the CSR literature. For example, CSR literature reviews have tended to not address lobbying at all (e.g., Carroll & Shabana, 2010; Garriga & Melé, 2004; Lee, 2008). We argue that the paradigms that dominate CSR can be used to both conceptualize – and *limit* conceptions of – responsible lobbying. The manner in which CSR is conceptualized is therefore of fundamental importance to the meaning of responsible lobbying.

We consider the conceptualization of CSR as *intrinsically discretionary*, notwithstanding an increase of government policies for CSR (see below), to be highly significant. It is widely considered that corporate responsibilities encompass a range of “expectations placed on organizations by society” (Carroll & Buchholz, 2000, p. 35), which are met in “actions that appear to further some social good, beyond the interests of the firm and that which is required by law” (McWilliams & Siegel, 2001, p. 117). Indeed, CSR is widely considered as “a form of self-regulation to contribute to [societal] welfare” (Moon, 2007, p. 298). In short, the literature largely emphasizes voluntarism (e.g., Brammer, Jackson, & Matten, 2012), a focus retained in the emerging political CSR literature (Rasche, 2015; also Whelan, 2012). Conceptualizations of CSR as inherently discretionary are congruent with a wider preference for a political dispensation in which state power is to be curtailed (see ‘self-regulation,’ below). In such a preference, regulation is to be avoided wherever possible, in favor of voluntary actions. This helps to explain why ‘self-regulation’ features in this paper as one approach to responsible lobbying.

Furthermore, Western corporations now operate within the context of an economic model, in which self-interest is a fundamental value (e.g., Ferraro, Pfeffer, & Sutton, 2005; Wang, Malhotra, & Murnighan, 2011). CSR literature has not been immune to this. For example, Lee (2008) notes that the approach underpinning CSR literature has changed over time, from mostly-normative to mostly-instrumental. Indeed, Kinderman (2012) shows how CSR and neo-liberalism co-evolved in the UK.

Such a context is congruent with a generalized resistance to government rules (see Anastasiadis, 2014; also Singer's call for better understanding of companies' assumptions).

Related literatures

Two important debates within the CSR literature explore firms' political power, but without being directly relevant to lobbying: we have therefore excluded them from the scope of this paper. The first addresses the state's relationship with CSR (e.g., Midttun, 2008; Steurer, 2010; also, Zhao, 2012). That debate is focused on private authority, on the potential for relational governance in CSR programs, and on firms' strategic use of CSR to manage relationships with governments. There has been some interesting recent work in this area. For example, Knudsen and Brown (2015) argue that state involvement in CSR is mutually-beneficial to business and government (also Dentchev, van Baelen & Haezendonck, 2015; Knudsen & Moon, 2017). Knudsen, Moon and Slager (2015) present the results of a Europe-wide analysis of government policy on CSR. The states-and-CSR literature can be read together with the varieties of capital literature, which has received some attention with respect to CSR (e.g., Matten & Moon, 2008). Nonetheless, it is more focused on governments' influence on CSR than on the manner in which corporations engage with public policy.

The second debate is on political perspectives on CSR; the focus being on corporate accountability under conditions of globalization and government retreat (or absence). This debate has two main strands (following Whelan, 2012). The *corporate citizenship* strand is about firms' roles in the lives of individuals, in particular in a context of governmental absence (e.g., Crane, Matten, & Moon, 2008; Matten & Crane, 2005). The *political CSR* strand is concerned with an updated political economics in a post-Westphalian context (Scherer & Palazzo, 2007, 2011). Whelan's (2012) critical review of these political perspectives usefully cautions that theoretical developments should remain compatible with firms' profit motive. Lobbying has been beyond the scope of this political literature stream (e.g., Palazzo & Scherer's, 2008, p. 581, "mere lobbyism"). Recent work by Rasche (2015)

starts to bring together the literatures on *CPA* (which he identifies as mainly North American) and political CSR (characterized as predominantly European).

Perspectives on responsible lobbying

Having provided a conceptual frame for responsible lobbying, we present four perspectives on lobbying and the responsible firm. To this end, we distinguish between mostly-normative (ethical frameworks and contextual perspectives) and mostly-practical approaches (self-regulation and transparency) to responsible lobbying.

Table 1 presented a typology of lobbying and the responsible firm. We now provide an overview of the literature to flesh out this Table. Our guiding question was, “What does the literature tell us about lobbying and the responsible firm?” To answer that question, we examined work published between 1995 and 2015. In reviewing the literature we took three steps. First, we conducted keyword searches using EBSCOhost’s Business Source Complete database, for papers in scholarly, peer-reviewed journals, January 1995 – December 2015, as indicated in Table 2. There were broadly two types of term: those relating to political action and those referring to corporate responsibility. Keyword searches referenced each ‘political’ keyword against each ‘responsibility’ keyword, rendering 35 binary keyword searches in total. Searches rendered between 41 (lobby*/CSR) and 4703 (regulation/respons*) hits, though many of these appeared multiple times. Where a two-term search returned over 500 hits, we conducted a refined search (e.g. “political activity” and “ethics” rendered 531 hits; adding “corp*” rendered 200). We discounted multi-term searches returning over 500 hits on the grounds that they were insufficiently-precise. We then scanned each paper’s title and Abstract to check for relevance, before reading all relevant papers.

The second main aspect of the literature review was a manual search for relevant papers in leading social science journals since 1995 (in CSR/business ethics, general management, and political

science; again, as indicated in Table 2). Third, we tracked key citations, ensuring that we included other relevant literature, such as books and practitioner literature. This final step proved significant, as there was a substantial gap in focus between the academic and practitioner literature, with academic work largely taking a normative focus and practitioner mechanisms being more interested in practical mechanisms. Including both types of literature enabled us to develop a comprehensive picture. The above process rendered 344 works, though substantially fewer than that were useful for our paper (our manuscript contains 148 references in total).

Table 2: Keyword search for this review

Business ethics / CSR	Journal of Business Ethics Business Ethics Quarterly Business Ethics: European Review	<u>CPA-related keywords</u> Lobby* Advoc* CPA Political action Political activity Politics Regulation <u>CSR-related keywords</u> CSR Ethics Corporate responsibility Governance Responsib*
Governance	Corporate Governance Corporate Governance: An International Review	
Political science	Public Administration Review Journal of Public Affairs Journal of European Public Policy American Political Science Review	
General management	Administrative Science Quarterly Academy of Management Review Journal of Management Studies Strategic Management Journal California Management Review Harvard Business Review International Journal of Management Reviews	
Other social science sources	American Sociological Review Socio-Economic Review	

Four distinct lenses emerged from the literature, through which the relationship between lobbying and the responsible firm has been viewed. These result from our analysis of the available literature: they are grounded in, the data, and are emergent after analysis (coding) and theoretical interpretation². Our multiple-iterative analysis process was influenced by the seven-step operation that Spiggle (1994, pp. 493-496) proposes for qualitative data: categorization, abstraction, comparison, dimensionalization, integration, iteration, and refutation. It is conceptually related to the structured (from scientific disciplines: see Bowen, 2009) or systematic (from medicine: see Tranfield, Denyer, & Smart, 2003) literature review, and is similar in practice to the process adopted in a recent study on extremism (Moufahim, Reedy, & Humphreys, 2015) in which the authors write “During each of these stages of analysis we discussed emergent ideas and wrote a set of memos to record our analytical process” (p. 98). Massaro and colleagues (2016, p. 769, Figure 1) present a useful continuum, in which they place a rapid review (no rules) and structured literature review (rigid rules) at the two ends. Our approach lies between these two extremes, modifying the rigor of a structured literature review with the authors’ existing detailed and well-grounded knowledge of the CSR and lobbying fields (e.g., concerning the inclusion and interpretation of individual sources of literature). The coding process was followed by theoretical interpretation based on our “interpretive sensitivities” (Phillips & Hardy, 2002, p. 75) and finalized in discussion amongst the authors. Thus our overall approach could be described as “an iterative process in which ideas are used to make sense of data, and data used to change ideas” (Hammersley & Atkinson, 2007, p. 158). The specific steps in this process were as follows. One author read and re-read all the papers and developed initial codes. The other two authors each read half of the papers (selected randomly) and did the same. We then compared our coding in discussion and rationalized our results.

² For further information, please see the accompanying online file. This provides a full bibliography in tabular form of the works consulted in preparing this paper, together with an indication of which of the four lenses a particular piece of work most closely fits.

Generally, *ethical frameworks* are normatively-focused and directly address the act of lobbying, whilst *self-regulation* and *transparency* frameworks address lobbying indirectly and are largely practice-focused; that is, they address directly-relevant topics, but without explicitly mentioning responsible lobbying. An additional group of literature approaches lobbying normatively in terms of the *context* within which lobbying occurs, typically focusing on deliberative approaches. This final group of literatures is newer and less well-developed than the other approaches and, we suggest, may be indicative of a new wave of normative scholarly interest in responsible lobbying. The framework presents four discrete categories. However, the boundaries are not impermeable. For example, self-regulation is a practical mechanism, often portrayed as instrumental, but it contains normative elements, and ethical frameworks often contain reference to practical mechanisms such as codes of conduct and/or transparency. There is clearly scope for further research to develop the framework, introducing greater nuance.

Normative focus on responsible lobbying

Ethical frameworks

Most academics who engage explicitly with the topic of ‘responsible lobbying’ do so with reference to ethical frameworks. These are relevant to both the content and process of lobbying. Such normative work is mainly interested in the principles influencing the conduct of lobbying. Frameworks are theoretically elegant and are hence good for establishing principles against which actions are to be measured, and thus influencing organizations’ stated policies. However, ethical frameworks are also incomplete, as they do not typically consider the context within which lobbying occurs, and seldom lend themselves to practical mechanisms.

Much of the earlier work on responsible lobbying appeared in *Business Ethics Quarterly* (BEQ). For example, Weber (1996) reflects on the ethics of lobbying and (1997) on appropriate practices for lobbying, Hamilton and Hoch (1997) present general standards for ethical lobbying, and Keffer

and Hill (1997) propose an ethical framework focused on lobbying impact on external stakeholders. Another notable contribution to this area is Oberman's (2004) ethical framework, which is concerned with reducing the "real and perceived risk of business domination" (2004, p. 253), and which develops a tool for the *ex-ante* ethical analysis of lobbying action as practiced in a competitive environment, revolving around three ethical criteria: access, legitimation and influence in a contestable system.

In one of the most comprehensive recent treatments of responsible lobbying, Ostas (2007) analyses the legal framework and ethics of lobbying in the United States. He considers whether lobbying should be a venue for "self-interested competition... for private gain, or ... [rather, a venue for cooperating] with public officials to advance the public good" (ibid., pp. 43-44). In other words, should the lobbyist be an advocate (self-interested promotion, in the absence of a measurable, immutable public good), or should the lobbyist be a public citizen (i.e., promoting public good through civic duty)? Ostas argues both normatively ("lobbyists must justify their actions with a normative reference to the common good;" ibid, p. 54), as well as pragmatically (in a pluralist environment, "the advocacy of self-interest is both expected and defensible;" idem.). This dichotomy nicely illustrates the central challenge of developing a normative model that will have practical application. To solve it, Ostas appears to rely on a view that the process of pluralist policymaking provides a sufficient guarantee of socially-valuable outcomes that firms are free to pursue their own self-interest.

Ostas's paper raises two kinds of question which are symptomatic of the weaknesses of ethical frameworks. First, how is the common good defined in a pluralist environment; i.e. on what basis can lobbying be judged to be 'responsible', and what is the role of power in doing so? Second, what is the consequence of firms providing inaccurate information (content) whilst acting in an otherwise appropriate manner (correct process)? In answer to the first question, definitions of the common good can vary widely, even in the same political environment. We favor a discursive approach to answering the first question (see below). The second question receives some attention

elsewhere, with Baron's (2006, p. 233) admonition against "crying wolf and making false claims." Yet non-corporate actors perceive precisely such behavior from corporate lobbyists (as numerous news reports attest)³.

Some recent change in the target of the normative-focused (and mainly academic) literature should be noted. Whereas until 2013, ethical frameworks accounted for the clear majority of academic work on lobbying and the responsible firm, subsequently interest in the context of lobbying started to develop, and most recent papers have started to pay greater attention to this aspect. For those approaching the topic normatively, deliberative perspectives have increasingly become the preferred approach. Notwithstanding this recent trend, overall, ethical frameworks for lobbying have tended to focus on the act of lobbying, and the principal criticism of such frameworks is that they tend to be internally consistent, but not practicable.

Context/Deliberative perspectives

By contrast to earlier work, nearly all scholarly publications on responsible lobbying since 2014 have been concerned with the context within which lobbying occurs, typically attending to deliberative perspectives. We speculate that this is part of a wider 'deliberative turn' in the social science literature, visible not only in political conceptions of CSR (see above), but also in political science (Dryzek, 2000; more specifically on lobbying: Greenwood, 2011; Gutmann & Thompson, 2004)⁴. The deliberative lens is visible in, and favored by, practitioner and researcher literatures.

Work using the deliberative lens on lobbying has two commonalities. First, it considers that it is insufficient to examine the content or process of a company's lobbying in the absence of the *context* within which that lobbying is taking place. Second, there is general convergence on the value of

³ An online search with such terms as "lobbyists deceive" renders hundreds of thousands of results, most of the first four pages of which relate to stories or reports of deceptive lobbying.

⁴ Indeed, the only two doctoral theses of which we are aware that explicitly address responsible lobbying (Anastasiadis, 2010; Bauer, 2017) both devote substantial chapters to deliberation.

deliberative principles (AccountAbility & The Global Compact, 2005; Anastasiadis 2014; Bauer 2014; 2016; 2017). Drawing on Habermas, Lock and Seele (2016) have promoted a deliberative approach as a means of explicitly reconciling CSR and CPA (including lobbying), which they clearly position as a normative stance (p. 419). Whilst we find the deliberative perspective promising, we see danger in an exclusive focus on *Habermasian* deliberative approaches, not least because it is hard to guarantee the prerequisite conditions for a Habermasian discourse ethic. Moreover, as Lock and Seele (2016, pp. 427-428) note, deliberative approaches are based on voluntariness, which is not unproblematic in the context of setting rules for business activities that generate external costs. Without greater clarity, deliberative perspectives could become similar to ethical frameworks in being theoretically elegant yet impracticable. Hence, we address questions of power in our later discussion.

Rehbein and Schuler observe that the “decision process within the firm has by and large been overlooked” in lobbying research (1999, p. 145; also Lawton et al., 2013). Anastasiadis (2014) goes some way to addressing this empirical gap, presenting case study research on company-internal processes and developing a narrative model of corporate lobbying. He finds that “the CSR function has no role in lobbying” (ibid., p. 273) – suggesting that, in practice, firms’ CSR policies play “no role in the political arena” (idem). Instead, he argues, firms interact very differently with the political process depending on their dominant internal narrative. Those which approach the political environment from an instrumental perspective tend to be hostile to regulation, whereas those taking a cooperative approach (a minority) will have a more sanguine view (see p. 285). He argues for change in companies’ lobbying, but seeks to integrate lobbying with corporate citizenship. Finally, Bauer’s (2014) approach to responsible lobbying (elaborated in Bauer 2017) is strongly influenced by a Habermasian deliberative approach. She develops a multidimensional model of responsible lobbying, based on “three content-related pillars” (congruence between CSR and lobbying; consideration of stakeholders; alignment with societal values), with “ethical, democratic dialogue” as the foundation for all three (2014, see Fig. 1, p. 66). Her approach has

similarities with that of Lock and Seele (2016). However, such a view presumes both that society's values and objectives are unambiguous and easily-understood, and that corporate lobbying affects only the society within which the lobbying is taking place. Both assumptions are questionable. Notwithstanding the limitations of her work, Bauer's contribution lays a useful foundation for future research in a promising area.

Despite the recent surge in scholarly interest in deliberative perspectives, the total amount of literature on lobbying and the responsible firm with a normative focus is overshadowed by the literature addressing practical mechanisms. Generally, there are two lenses through which the practice-oriented literature views lobbying: self-regulation and transparency. Both of these tap into much wider discourses that have substantial motivational power.

Practice-oriented focus on relevant areas

Self-regulation

Lobbying is not exclusively concerned with influencing regulation: it is also about more generally shaping the boundary conditions under which firms operate. Indeed, a substantial theme in lobbying is whether formal public policy is needed at all, and if so, in what form (e.g., regulation or market-based-instruments). After all, much lobbying typically happens before a policy proposal emerges (Mazey & Richardson, 2001, pp. 219–220). We note that firms often consider government regulation to be undesirable *per se*, and favor voluntary approaches (see den Hond et al., 2014), a view clearly linked with a liberal-minimalist view of citizenship that stresses the protection of “individual citizens from arbitrary rule and oppression by government” (Stokes, 2002, p. 28). In the liberal-minimalist tradition, a ‘responsible’ firm might resist, and lobby for alternatives to, government regulation as a matter of principle. Self-regulation elides government rule-setting and is compatible with liberal-minimalism. Depending on the specifics, self-regulation can be relevant to practical mechanisms for the act of lobbying, as well as to the lobbying context.

Self-regulation can be sub-categorized into two classes. *Voluntary commitments* side-step or replace regulation by substituting corporate-generated content⁵. *Codes of conduct* on lobbying, by contrast, regulate individual behavior in the lobbying process. Both have an indirect perspective on lobbying and the responsible firm that is compatible with the neo-liberal economic perspective (for a trenchant critique, see Ghoshal, 2005). The thinking behind self-regulation is that it provides a more efficient means through which to achieve public policy goals. Civil society actors often argue that it is a way for firms to avoid their responsibilities, whilst firms promote self-regulation as an efficient means of producing public goods.

In the case of lobbying, self-regulation is often a way of avoiding scrutiny, or setting the terms by which corporate lobbying will be scrutinized. For example, from a legal perspective, Simon (2006) argues that the food industry in the US cannot be trusted to self-regulate its marketing to children, adding that federal government advisory groups are dominated by the industry. From an economic perspective, Maxwell and colleagues (2000, p. 583) approve of “strategic self-regulation” that preempts political action. Public affairs associations frequently develop their own codes of lobbying conduct (e.g., SEAP, 2009). Management academics are frequently critical of self-regulation initiatives, particularly when they are poorly conceived (e.g., King & Lenox, 2000; Lenox & Nash, 2003). Short & Toffel’s (2010, p. 362) research acknowledges that self-regulatory structures can promote the internalization of norms, and argues that there is a clear normative component in firms’ adoption of self-regulatory instruments, but finds that self-regulation can also “serve as vehicles for circumventing, and even undermining, the core values that animate law.” In this respect, we note Rasche’s (2010) work on the question of CSR standards and standardization, which focuses particularly on the limitations of standardization, and illustrates the difficulties inherent in seeking standardized approaches to responsible lobbying. The relevant questions from a responsible lobbying perspective are therefore, ‘What is the role of responsible corporate lobbying in designing

⁵ These are typically seen as examples of business responsibility, given that voluntary commitments go beyond existing legislation.

the specific way in which self-regulation will work; and is the outcome of greater social value than if no industry lobbyists were to participate (and how can that be assessed)?' Skepticism of self-regulation (e.g., AccountAbility & The Global Compact, 2005; Caulkin & Collins, 2003) usually reflects assumptions about the power without responsibility that firms can thereby acquire (Prakash, 2000, p. 184). From this perspective, transparency has been considered a necessary complement to self-regulation.

Transparency

The final of the four lenses through which responsible lobbying is addressed in the literature is transparency. Transparency and self-regulation are conceptually distinct, but closely related. That is, much self-regulation involves some form of commitment to transparency.

As one commentator put it: "the problem is not the lobbying: it is the secrecy" (Wright, 2011).

Transparency is thus promoted by civil society (AccountAbility & The Global Compact, 2005; e.g., Caulkin & Collins, 2003; SustainAbility & WWF, 2005). Transparency International, a civil society organization, equates transparency with freedom from corruption, and provides a review of lobbying regulation across Europe with the intention of promoting greater lobbying transparency (Mulcahy, 2015). Put colloquially, transparency seems a promising way for civil society to "keep the bastards honest" (see Lidberg, 2006, p. 9). Most transparency recommendations with respect to lobbying involve two mechanisms: a register of lobbyists (e.g., Lock & Seele, 2016, p. 425) and/or publication of financial flows.

Technological developments over the past few decades have undoubtedly enhanced transparency's promise. On the other hand, corporations can use transparency as a means of increasing legitimacy. For example, the World Business Council for Sustainable Development names transparency one of the "basic prerequisites for successful business and sustainable development" (WBCSD, n.d.). Transparency is also popular with government and state actors (e.g., OECD, 2010). Indeed, the

scale of that popularity is illustrated by Bauer's finding (2017, p. 209, also p. 210, Table 17) that transparency is by far the most likely aspect to be seen as important in responsible lobbying. Its popularity suggests that transparency has become an appraisive concept (Bernstein, 2012; see Billet, 2007). Birchall (2011) traces the moral discourse of transparency to the Enlightenment. Arellano-Gault and Lepore (2011) offer a compelling explanation of transparency's contemporary appeal. The purpose of transparency, they argue, is to generate "greater confidence in governmental decision-making and informed discussion on political issues that may lead to more effective policy design" (idem., p. 1030). Transparency is easily the single most commonly-occurring practitioner-element of the perspectives on responsible lobbying outlined in this paper. Any overview of perspectives on lobbying and the responsible firm must therefore address transparency. Though there has yet to be a thorough analysis of transparency in lobbying (though see Naurin, 2007; Mulcahy, 2015), we raise two general difficulties with using transparency in the context of responsible lobbying.

First, we are skeptical of calls for transparency. We argue that such calls undermine trust in politics more generally, echoing Michael Power's (1997) clear critique of the audit society, of which transparency is a constituent element. Auditing, he argues, is part of a "broader politics of fear and anxiety" (p. 138), and is designed to produce comfort (p. 123), yet which can result in "less actual control" (p. 141). As such, transparency can be seen as a repression of secrecy in order to generate accountability. Yet, there is a clear relationship between secrecy and transparency, and there is a long tradition of hiding information in plain view (Phillips, 2011). Indeed, a certain amount of secrecy is arguably essential (Horn, 2011), and one could even argue that transparency untrammelled can act as a totalitarian tool (Boothroyd, 2011). For these reasons, Birchall (2011, p. 18, emphasis in original) refers to the "indissoluble relationship *between* transparency and secrecy." Moreover, transparency typically assumes a linear model of communication that ignores complexity, leading to opacity in the midst of transparency policies (Fenster, 2006, pp. 915 ff.). This is particularly acute in the case of big data, which Galloway (2011) argues is causing informational opacity. Moving to

corporations specifically, Schipper and Boje (2008, p. 510) argue that, while transparency is considered to support virtue, “being too transparent might put integrity in jeopardy.” We find their maxim compelling: “openness if suitable, transparency when necessary and integrity always” (ibid. p. 522). In short, there are good reasons for being wary of over-estimating the potential for transparency to promote accountability. We therefore suggest that calls for greater transparency in lobbying are to be understood symbolically, in line with attempts to gain/retain legitimacy.

Secondly, we note that transparency in *lobbying* is poorly-specified. It is not clear what should be transparent, nor how it is to be usefully achieved. One can conceive of various kinds of transparency. For example, financial transparency would address the flow of money in the political environment. Such transparency is unobjectionable and is widely-practiced, but is more suited to policing corruption in wider CPA than to ensuring responsible lobbying. Further conceptual work on transparency in lobbying is therefore needed before transparency can be theoretically-useful or operationally-meaningful.

We have so far provided a thematic overview of the literature on lobbying and the responsible firm, showing four lenses: ethical frameworks, deliberative perspectives, self-regulation and transparency. These overlap to some extent, but are conceptually distinct. We are now in a position to populate the conceptual framework originally presented in Table 1: see Table 3. The normative perspectives address lobbying directly, whereas the practical mechanisms inform both lobbying and the manner in which lobbying is conceptualized. The four components address different aspects relevant to lobbying: content, process, organization, and external environment. Of these, two – content and process – principally address the act of lobbying. The other two components – organization and external environment – are more concerned with the context within which lobbying occurs. We have labeled this bifurcation, “aspect of lobbying”, to indicate the clear distinction in focus within the literature. Based on our review, we now propose a preliminary research agenda, locating the two main elements of that agenda in our conceptual framework.

Table 3: Typology of lobbying and the responsible firm: Populated with existing literature and locating the research agenda within the typology

Typology of responsible lobbying		Components			
		Content	Process	Organization	External environment
Orientation	Normative focus	Ethical Frameworks e.g., Ostas 2007 Focus in Research Agenda: Externalities perspective	Ethical Frameworks e.g., Weber 1997 Focus in Research Agenda: Externalities perspective	Deliberative Perspective e.g., Anastasiadis 2014 Focus in Research Agenda: Discursive approaches	Deliberative Perspective e.g., Lock & Seele 2016 Focus in Research Agenda: Discursive approaches
	Practical mechanisms	Self-regulation e.g., Maxwell et al. 2000 Transparency e.g., SustainAbility & WWF 2005 Focus in Research Agenda: Externalities perspective	Self-regulation e.g., SEAP 2009 Transparency e.g., Mulcahy 2015 Focus in Research Agenda: Externalities perspective	Deliberative Perspective e.g., AccountAbility & Global Compact 2005 Self-regulation e.g., Short & Toffel 2010 Focus in Research Agenda: Discursive approaches	Deliberative Perspective e.g., Bauer 2017 Focus in Research Agenda: Discursive approaches
Aspect of lobbying		Operational lobbying: The act of lobbying		Conditions for lobbying: Lobbying context	

Note: the examples of the literature included are those which exemplify the literature in the typology, provided for illustrative purposes

Lobbying on its own terms: A research agenda

We started this paper by providing a clear conceptualization of lobbying, and developing a working definition of responsible lobbying. We then reviewed the literature on lobbying and the responsible firm, revealing numerous lacunae in the process. We now propose a research agenda to substantially extend existing work on the act of lobbying, and open new areas in lobbying context, in a comprehensive, theoretically-sound, and practically-useful manner. The overarching question for

this research agenda is, ‘what are the necessary and sufficient conditions to drive, and ensure the development of, responsible corporate lobbying?’ Our agenda involves proposing two substantive directions for research, followed by several briefly-stated questions for further investigation.

Further work is clearly needed on all aspects of responsible lobbying, yet our review indicates that some areas are in greater need than others. This is particularly the case with the contextual components; both because there is comparatively little work in this area, and because the context informs both lobbying content and process. The first of our two main suggested directions revolves around discursive approaches, and is relevant to normative work in the context of both organizations and the political arena. The second avenue of exploration is around the internalization of external costs, and is relevant to both operational aspects of lobbying (content and process), as well as to the lobbying context. We emphasize that these two main avenues are a useful starting point for further work: even with the addition of our subsequent questions, we make no claim to completeness.

Context: Discursive approaches

There is a view emerging in the CSR literature that Habermas’s deliberative approach can fruitfully be developed for responsible lobbying. We note that that such an agenda is part of a wider ‘deliberative turn’ evident in democracy theory since the 1990s (Dryzek, 2000, p. 1), as well as being compatible with variations on the stakeholder approach.

However, we would resist the temptation to rely too heavily on Habermas, as others appear to have done; hence our choice of ‘discursive’ rather than ‘deliberative’. As Dryzek (2000, p. v) notes, the two terms have come to be used interchangeably. There is nonetheless a difference, with ‘discursive’ having the following three connotations which he argues makes it a superior term (ibid., pp. v-vi): it is social and inter-subjective rather than purely personal; it allows for a range of communication, rather than merely calm and reasoned argument; and it connotes *both* Habermas’s

discourse ethic (freeing) and Foucault's concern that discourse is constraining, in that it "conditions the way people think" (ibid., p. vi). We consider applying this discursive element – steeped in the Habermasian perspective, but influenced also by Foucault – to be useful for responsible lobbying, as it is more congruent with observed practice than a 'pure' Habermasian perspective.

According to Dryzek (2000, pp. 8ff), the deliberative turn in democracy theory has two starting points: liberal constitutionalism and critical theory. This latter is associated with Habermas, whose views have changed over time. Although Dryzek laments this change (ibid., pp. 20-30), it is precisely such later work that Scherer and Palazzo (2007) draw on – labeling it 'Habermas2' to distinguish it from his earlier work – and which is influencing CSR researchers. Habermas's normative model (1998, p. 239ff), which he terms "deliberative politics," is particularly attractive for management theorists. This is because it charts a pragmatic, process-oriented middle course between liberal and republican conceptions, integrating them "into the concept of an ideal procedure for deliberation and decision making" (ibid., p. 246).

Deliberation is a collective social process, allowing for "unruly and contentious communication" (Dryzek, 2000, p. vi) in solving conflicts. Because it is process-oriented, "the product will not generally be consensus" (ibid., p. 17; see also Gutmann & Thompson, 2004), and the process does *not* necessarily "culminate in a 'unified public will'" (Dryzek, 2000, p. 17). This makes it well-suited to the (Western) political arena, with its many different perspectives. Habermas's view of deliberative politics is based on his two-part discourse ethic (e.g., Habermas, 1990, 1998, pp. 41–42). Corporate publications are now careful to stress the notion of collaboration, perhaps as a means of generating moral legitimacy (cf. Palazzo & Scherer, 2006). There are therefore sound practical – as well as theoretical – reasons to engage in some form of discursive approach.

In many respects, a political environment can be considered to have its own culture (e.g., Reich, 1998, portrays Washington, D.C. as a one-company town), distinct from the cultures of lobbyists'

‘home organizations’. As such, it can be expected to have its own norms, which sit alongside formal regulation of the lobbying process. Such norms have developed over time and reflect the exercise of power (see Vallentin & Murillo, 2012, p. 827). Researchers could usefully uncover the norms intrinsic to a given policymaking environment, using discursive tools to do so. That is,

instead of asking the usual instrumental questions of measurement and effect, we see a need to penetrate the polished surface of programmatic statements and official self-evaluations... and look into the networked and ‘messy’ micro-processes of programs and the technological setups to find out how [deliberative approaches in lobbying] actually works (Vallentin & Murillo, 2012, p. 837)

Singer (2013) would support Vallentin and Murillo’s view: in his recent paper integrating CSR, CPA and competitive strategy theories, Singer draws particular attention to the need to set out a company’s political assumptions. There has been some work on companies’ assumptions (Anastasiadis, 2014), but it remains an under-researched area. Frynas and Yamahaki (2016) make a similar point to Singer in their recent review of the CSR literature, particularly emphasizing both the significance of examining company-internal drivers of CSR, and the paucity of such work. The present paper adds strength to such calls call for more work on understanding the assumptions and drivers of companies’ policies and actions.

Moreover, as researchers like Lock and Seele (2016, pp. 424-425; see also Bauer, 2015) have pointed out, there are likely to be conditions both external and internal to a firm that can impede its ability to engage in responsible lobbying. A discursive approach can help in both of these aspects. For example, one external barrier is “the difficulty of including heterogenous actors” (Lock & Seele, 2016, p. 425). Engaging in a discursive process would be one way in which actors in the political environment could generate the norms to be followed in the lobbying process (Habermasian) whilst also taking the differential power of the individual participants into account (Foucauldian). Research could usefully explore the necessary boundary conditions for such a process. If followed, that process would not guarantee responsible lobbying, but would substantially

advance progress towards achievement of two of the four aspects of our definition of responsible lobbying: process and environment.

However, we argue that a discursive approach also requires caution. Baysinger (1984, p. 249) notes that the objective of lobbying is to influence “legislative/regulatory processes so that the outcomes of those processes better reflect the internal goals of the organization (primarily economic).” His work reminds us of the potential economic significance of policy outcomes, reflecting Whelan’s (2012) admonition about firms’ need for profit. It is thus to be expected that corporate lobbyists face significant pressure to achieve favorable outcomes through lobbying, which may encourage actions that would not meet approval in a marketplace. We are therefore not confident that lobbyists and their employers can be persuaded in practice to engage in even a ‘Habermas2’ deliberative process, which requires such conditions to be met as absence of deception. This is particularly the case, given widespread corporate resistance to governmental ‘interference’.

Consequently, we suggest that any discursive approach to responsible lobbying will need to attend to the effects of power and dominant discourses, as well as of entrenched practices, within the political arena. Further, we note that firms are not uniform organizations, and that it is difficult to expect a company lobbyist to participate in a discursive process in the policymaking environment without paying attention also to company-internal processes, discourses and power-distribution. That is, we posit that a corporate lobbyist may face two competing sets of rules. We therefore suggest that Foucault’s analytical tools (1991, 1994; see Gordon, 1994) will be indispensable to discursive work. Governmentality is a form of institutionalized power for socially integrating actors into a given organizational system (such as the political environment or the individual firm) in a predictable manner (e.g., Kromidha et al., 2017.). Recent work on governmentality in governmental approaches to CSR (Vallentin & Murillo, 2012, notably pp. 830-833) and Dean’s (2010) four analytics of governmentality – visibility, techne, episteme and identity – provide an excellent guide to how research in this area might proceed. For example, episteme is about forms of knowledge that might include professional standards such as codes of conduct, and the techne analytic refers to

technical ways (e.g., specific language or procedures) by which an evolving regime (e.g. ways of lobbying) can be enabled and created.

For researchers, a discursive approach thus suggests a range of processual questions congruent with wider concerns about the context within which lobbying occurs. How do individual lobbyists balance the varying demands of their employers and the policymaking environment? Which discourses have the greatest power in the policymaking arena (what Foucault might call the “politics of truth”; see Ashenden & Owen, 1999, p. 9), and what epistemological assumptions underlie such discourses? What mechanisms might be in place to reach decisions on the processes for establishing the basis for responsible lobbying? Answering such questions would provide theoretical and practical guidance on both processes for responsible lobbying and an enabling environment.

We suggest that research to answer such questions needs to be highly-granular, with data collected from ethnographic study, interviews, and/or participant observation being more likely to render robust results than survey data. We also see focus groups as a potentially-fruitful, if under-utilized method (see Cowton & Downs, 2015). Our suggestion is congruent with researchers’ experience (McWilliams, Siegel, & Wright, 2006; e.g., Rehbein & Schuler, 1999), which suggests that gaining access to meaningful data may be unusually challenging, so that small-scale research may in any case be a pragmatic necessity. We would add that researchers should not be nervous of engaging in well-crafted small-sample research; generalization from case study research is respectable under certain conditions (Tsang, 2014). Our suggestions are in line with recent calls for greater methodological diversity within management research (e.g., Klag & Langley, 2013; Scherbaum & Meade, 2013).

Externalities perspective

We note that the policymaking environment is dominated by arguments of a rational-economic nature. We note also that firms' professed CSR principles can often be summarized as a statement of intent to avoid creating external costs (see also Vigneau, Humphreys & Moon, 2015). In addition to suggesting a discursive approach, we therefore propose exploring whether responsible lobbying could be fruitfully addressed through attention to internalization of external costs. That is, it may be useful to pay attention to arguments about who is to bear the costs of corporate actions. Such an approach would channel the normative pressure on a firm to pursue its internal goals, without seeking outcomes that compromise the social good.

The external costs of business activity can be substantial, so even modest success in reducing them could generate significant benefits for society; for example, the estimated cost of industrial air pollution to the European Union was at least Eur.102Bn in 2009 (EEA, 2011, p. 8). Internalizing external costs is well-understood as a way to "rectify market failures" (Arrow, 1973, p. 303), and Crouch has argued that CSR should be seen as "essentially 'corporate externality recognition'" (2006, p. 1534). There has even been some suggestion that firms should promote internalization of external costs through their lobbying efforts (Vogel, 2005, 2008), though the literature is silent on how this would be achieved. Most importantly, a focus on externalities changes the nature of the debate on responsible lobbying, creating normative pressure that uses the language of public policy.

For researchers, this means asking questions about content. For example, to what extent do companies take externalities into account in their analyses, to what extent do they provide such information to policymakers, and to what extent do they resist or welcome policies that seek to internalize externalities? With respect to organizations, researchers might usefully compare firms that have integrated their lobbying and CSR function closely into the company with those that view lobbying as separate function. There have been recent calls for integration between functions in pursuit of responsible lobbying (e.g., Bauer, 2016; den Hond et al, 2014; Lock & Seele, 2016), and

such research would provide an empirical test of the efficacy of such organization-internal arrangements in promoting responsible lobbying.

Doing so with a focus on externalities is useful: pragmatically, participants in the policymaking environment seem likely to raise the question of externalities anyway, and focusing on externalities is a way for firms to show, measurably, congruence between their CSR policies, societal concerns, and lobbying on issues that are material to them. We are of course aware that there are well-known risks associated with taking an economic approach to research in this area (e.g., Prasad & Elmes, 2005). Moreover, it remains possible for firms to adopt the language of externalities whilst nevertheless engaging in a dishonest manner with other political actors. Nonetheless, we consider it worth further investigation, particularly in conjunction with the previous research stream. In this respect, we note that Francés-Gómez and colleagues (2015) have proposed a promising perspective on the use of experimental economics, which may prove fruitful.

Moreover, such an approach could open up space for questions about how firms approach their own internal decision-making with respect to lobbying; this is useful for a discursive perspective also, as we argue above. How exactly would research proceed? In the first instance, seek firms that take such an approach already. In the second instance, perhaps laboratory studies or role-play, or even A/B testing of specific arguments, both with respect to the integration of lobbying within the firm and efficacy of argumentation in the political environment. An externalities perspective has the potential to substantially advance the content and organization aspects of our definition of responsible lobbying.

To conclude this section, we raise two further general questions. The more wide-ranging of these is about lobbying content and the materiality of issues (see AccountAbility and The Global Compact, 2005). For example, consider public policymaking on tobacco advertising rules and on the specific shape of wing-mirrors required for type-approval of heavy goods vehicles. Whilst the significance

of the lobbying *process* is arguably equally important in both policy examples, the salience of the *content* aspect arguably varies greatly, in direct proportion to the potential impact on society and the companies involved. The general question is, therefore: what are the implications for responsible lobbying of the materiality of a policy issue? A sub-question is around how firms decide on the division of labor; to what extent they will engage in lobbying themselves, and to what extent they will proceed via third-party actors (e.g. consultants). The rise of corporate political advocacy (Wettstein & Baur, 2016) suggests this may become an increasingly urgent question. Finally, this paper addresses the topic of responsible lobbying: is irresponsible lobbying the binary opposite, or can one conceive of a spectrum? Further conceptual work on ‘irresponsible lobbying’ may prove fruitful.

Methodologically, this work comes with numerous challenges. For example, qualitative research such as interviews or ethnography can provide extremely rich data, but the nature of corporate lobbying means it can be unusually challenging to gain access to research site(s). By contrast, academics wishing to undertake quantitative research on responsible lobbying may find such work especially challenging, not least because of the difficulty in finding a meaningful dependent variable to measure. One area to start with would be to better understand the relationship between corporate lobbying and changing levels of external costs associated with specific industries. That may require a degree of methodological innovation. We note that the above methodological considerations have significant implications for the pace at which the empirical research is likely to be able to be conducted. There is therefore a danger that this research agenda is attractive only to tenured faculty. Pragmatically, moments of particularly significant public policy debate may provide serendipitous opportunities for speedier research.

Conclusion

We have differentiated between lobbying and CPA, provided definitions of lobbying and responsible lobbying, and have developed a working model of responsible lobbying (Table 1;

expanded in Table 3), based on the four components of our definition of responsible lobbying. We then reviewed the extant literature on lobbying and the responsible firm, differentiating between literature on the act of lobbying and that addressing the context within which lobbying takes place. This allowed us a tabular overview, showing areas of greater and lesser coverage and detail. One feature of the literature was the presence of relevant practice-oriented perspectives. Following our review, we made suggestions for a research agenda that provides a starting point for a comprehensive model of responsible lobbying. This centered on two directions for urgent attention: discursive approaches and an externalities-focus, each with its own set of methodological challenges. We also posed a number of further questions.

Goodpaster (2011) warns of a future in which business ethics contains either elegant normative theories divorced from practice, or practice-led research with little normative content. We believe our paper strikes a middle path between these twin dangers. In so doing, we have made a significant contribution to both management and political science scholarship, providing conceptual clarity and a fruitful research agenda for responsible lobbying, within a clear and structured conceptual framework.

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